

-----Original Message-----

**From:** Rod Hendricks [mailto:Rod@independentdrilling.com]

**Sent:** Monday, March 12, 2007 3:20 PM

**To:** 'john.sharkey@idwr.idaho.com'

**Subject:** FW: well construction rules

-----Original Message-----

**From:** Rod Hendricks [mailto:Rod@independentdrilling.com]

**Sent:** Friday, March 09, 2007 5:21 PM

**To:** 'john.sharkey@idwr.idaho.gov'

**Subject:** well construction rules

- A.        A.        Somewhere between lines 589-591 I would like to see the following, or something along these lines put in.

“ If the Well Driller constructs a well that encounters or produces water from consolidated formations, where no water is encountered above the bottom of the casing, or the artesian pressure of the aquifer doesn't rise above the bottom of the casing, or isn't shown to be and interconnected aquifer, the Well Driller shall adhere to one of the following methods”

Arguments; 1) There will always be “ ifs “ no matter how stringent the rules become.

- 2) 2) By putting the set-back tables into place (line 354), the majority of the “ ifs “ have been addressed.
- 3) 3) Through education, the quality of the well's being drilled have been increasing over the past 2 decades, and  
The quality of the well's drilled in the future are going to continue to increase regardless of what the rules state.

- B.        B.        I feel that the annular space requirements need to have some work done. I feel that there has been no consideration given in regards to nominal sizes. The requirements should read, if a 6” finish casing is used you must have a 10” borehole. Or the definition of Annular space should be changed to read “ the distance from the inside of the casing to the inside of the borehole”. This would allow the use of industry standard equipment & casing.

I also feel we need to totally delete the space requirements for pumping grout. This should just say “ an annular space large enough to allow for the Grout seal”. I think the rules for use of Bentonite chip and Granular Bentonite is to redundant. We could delete the 2<sup>nd</sup> line on each of those to categories and increase the 1<sup>st</sup> line annular requirement to 100' from 50'.

Arguments; 1) The tooling available in the market place warrants having the requirements consider nominal size.

- 2) 2) We don't carry a “drill bit index” on the rigs. We can't just pick something 1/8” bigger or smaller. The market is limited.

- 3) 3) We have had great success installing chipped bentonite down 100' in a 1.5" annulus in Island Park for years. This is a proven method of sealing.
- 4) 4) This same method works very well for Granular bentonite in a dry annular environment.

C. C. under item 095. line 1044 sand production.

I don't feel it is fair to the consumer to put a limit on what they can or cannot have as far as a well. Some wells develop over time, and require a pumping season to fully develop. What may not meet the criteria today could clear up and be an exceptable well in the future. There should also be some allowance given for above ground filtration products. Also there is no wording excluding injection wells. Does this mean we have to screen injection wells also? I think if the consumer is well informed, they can make their own decisions on the sand issue.

D. D. in line 1060 " the production rate shall be determined by a test of at least 1 hour in duration." Should be deleted.

Argument; 1) The volume of air we use in the construction of a well allows total evacuation of the aquifer. We can tell how much the total production of the well will be in a matter of minutes.

- 2) 2) I thought we wanted to limit "waste" of the aquifer. Blowing or pumping hundreds of gallons per minute out of a well for a set period seems like waste to me. Especially if the same out come could happen in 5-10 minutes.

E. E. Finally, I would like to thank you for all the efforts you have made on constructing this set of regulations. I know it is a thankless job, but all in all I think You have done a great job. Thank you John. Rod Hendricks